

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2014-2017	)	Docket No. 16-CRB-0010-SD
Satellite Royalty Funds	)	(2014-2017)
_____	)	

**MULTIGROUP CLAIMANTS’  
NOTICE OF CONTROVERSY RELATING TO  
THE ALLOCATION AND DISTRIBUTION OF  
2015-2017 SATELLITE ROYALTY FUNDS**

Worldwide Subsidy Group LLC dba Multigroup Claimants (“Multigroup Claimants”) hereby submits its Notice of Controversy in response to the Copyright Royalty Judges’ (“Judges”) *Corrected Scheduling Order and Notice of Voluntary Negotiation Period*, dated April 6, 2021, in the above-noted, consolidated docket.

Multigroup Claimants has claims related to satellite funds attributable to calendar years 2015, 2016, and 2017, for royalties awarded for programming appearing in the sports programming, devotional programming, and program suppliers categories.

**A. Nature of controversy, and Identification of Legal and Factual Issues.**

At this time, negotiations to resolve the allocation of funds within each of these categories have been unsuccessful.

In the instance of the sports programming category, the adverse party failed to respond to any overtures by Multigroup Claimants to have settlement discussions and, consequently, no legal or factual issues have been identified.

In the instance of the program suppliers category, Multigroup Claimants is willing to utilize the distribution methodology historically utilized by the adverse party, the Motion Picture Association and its Represented Program Suppliers (“MPA”), and affirmed following appeals to the U.S. Court of Appeals, but has been unable to secure a settlement agreement with the MPA.

In the instance of the devotional programming category, Multigroup Claimants is also willing to utilize the distribution methodology utilized by the adverse party in the immediately prior distribution proceeding (the Settling Devotional Claimants (“SDC”)), and stipulated between the parties in connection with the 2010-2013 satellite royalties, but has been unable to secure a settlement agreement with the SDC. The SDC has told Multigroup Claimants that it takes issue with Multigroup Claimants’ authority to act as a claimant. Although Multigroup Claimants solicited further explanation of such purported issue, none was provided, and consequently cannot be articulated further.

Although Multigroup Claimants intends to continue to negotiate in good faith, it has not reached a Distribution Phase settlement with the members in these categories, and while it remains possible that a settlement could occur, a hearing appears necessary to resolve controversies including the amount of royalties to be allocated to Multigroup Claimants' broadcasts in the respective categories.

If Allocation or Distribution Phase hearings are held, then Multigroup Claimants intends to participate.

Respectfully submitted,

Dated: July 19, 2021

\_\_\_\_\_/s/\_\_\_\_\_  
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Attorneys for Multigroup Claimants

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> of July, 2021, a copy of the foregoing was filed via the Copyright Royalty Judges' eCRB electronic filing system.

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston, Esq.

# Proof of Delivery

I hereby certify that on Monday, July 19, 2021, I provided a true and correct copy of the Multigroup Claimants' Notice Of Controversy Relating To The Allocation And Distribution Of 2015-2017 Satellite Royalty Funds to the following:

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via ESERVICE at ted@copyrightroyalties.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via ESERVICE at smosenkis@ascap.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via ESERVICE at scott@oandzlaw.com

Broadcaster Claimants Group, represented by John Stewart, served via ESERVICE at jstewart@crowell.com

Broadcast Music, Inc., represented by Jennifer T. Criss, served via ESERVICE at jennifer.criss@dbi.com

Joint Sports Claimants, represented by Michael E Kientzle, served via ESERVICE at michael.kientzle@arnoldporter.com

Devotional Claimants, represented by Matthew J MacLean, served via ESERVICE at matthew.maclean@pillsburylaw.com

Program Suppliers, represented by Lucy H Plovnick, served via ESERVICE at lhp@msk.com

SESAC Performing Rights, LLC, represented by John C. Beiter, served via ESERVICE at john@beiterlaw.com

Signed: /s/ Brian D Boydston